

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
U LOCK, INC.	)	Bankruptcy No. 22-20823-GLT
	)	
Debtor	)	Chapter 7
*****	)	
ROBERT H. SLONE, TRUSTEE	)	Document No.
	)	
Movant	)	
	)	
vs.	)	
	)	
CHRISTINE BIROS, FRED BANKS, DAVID PERLA,	)	
DENNY DULL, JOHN DULL, GARY CHERIPKA,	)	HEARING DATE: 10/6/22@10:30 a.m.
GLENN MOWRY, INW, JAR COAL COMPANY,	)	COURTROOM A—PITTSBURGH
JAMES CLAWSON, JEFFREY SHAW, JENNIFER	)	
VERRICO, MARK MYKA, PA TURNPIKE TOLL	)	
BY PLATE, PETERS PAINTING, R.J. ABREU,	)	
R. WOODALL, RSS, RICOBERTO NEGRETE	)	
GALENO. SARA STUMME, SHANNI SNYDER,	)	
SHARON McCANCE, SHELLY CHABANDE,	)	
BEN SHABANDE, STEPHEN CHAPAS, TERRY	)	
NOLL, TONY DAVIS, UNITED STEELWORKERS,	)	
WEST PENN POWER, WESTMORELAND COUNTY)	)	
TAX CLAIM BUREAU, AND RENEE BASISTA,	)	
	)	
RESPONDENTS	)	

**TRUSTEE’S MOTION TO SELL PERSONAL PROPERTY OF THE ESTATE**

AND NOW, comes the Trustee, Robert H. Slone, by and through his attorneys, Mahady & Mahady—Robert H. Slone, Esquire, and brings forth the within Motion to Sell Personal Property of the Estate, and states as follows:

1. The case of the Debtor, U Lock, Inc. (“U Lock”), was commenced by the filing of an involuntary petition for relief under Chapter 7 of Title 11 of the United States Code at the above number on April 27, 2022.
2. This court has jurisdiction over this Motion pursuant to 28 U.S.C. § 171(a), (b) and (c). Venue is proper in this district pursuant to 28 U.S.C. § 1473(a).
3. Robert H. Slone is the duly appointed Chapter 7 Trustee for the Debtor and is so acting.

4. Among the assets of the estate are Debtor's interest in the following (hereinafter "Personal Property"):
  - a. Personal property of the debtor being inventory, machinery, equipment and vehicles, and other tangible assets of the estate. A listing of the specific items is attached hereto and made a part hereof as Exhibit "A";
  - b. Eight (8) land/sea containers previously located on the site location; and
  - c. Twenty-three (23) truck trailers previously located on the site location.

A copy of the Google Earth U Lock Site 2014 photograph showing the truck trailers and containers is attached hereto and made a part hereof as Exhibit "B".
5. The Trustee has received an offer to purchase the Personal Property from Christine Biros for \$20,000.00 plus the assumption of all the property tax owed by U Lock, Inc. to the Westmoreland County Tax Claim Bureau and the Westmoreland County Municipalities levied on the real property located at 14140 U.S. Route 30, North Huntingdon, PA 15642, being Map No. 54-03-10-0-103, North Huntingdon Township. A copy of the proposed offer letter from Christine Biros' attorney, William Otto, to purchase the Personal Property is attached hereto and made a part hereof as Exhibit "C".
6. As of August 22, 2022, the property tax amount owing is \$20,764.70. Christine Biros will make all payments owed for the taxes which may exceed \$20,764.70. A copy of the Real Estate Tax Lien Certificate is attached hereto and made a part hereof as Exhibit "D".
7. The sale of the assets is "AS IS", "WERE IS" with no warranties of any type.
8. The Trustee avers that the best interest of this estate and its creditors will be served by this Court authorizing the sale of the Personal Property because it will net funds to the Trustee toward the payment of creditors.
9. The Trustee avers that the sales price is fair and reasonable under the circumstances but will welcome higher bids at the time of sale and confirmation.
10. The terms of the sale are: hand money in the amount of \$4,000.00 and the balance of the sale amount to be paid within 30 days of confirmation of the sale.

11. The Trustee recommends that he be authorized to consummate the sale of the Personal Property. to the buyer or to such other person or entity as may make a higher offer at the hearing thereon.

WHEREFORE, the Trustee respectfully request this Honorable Court to authorize the sale of the Personal Property as listed in the within motion. A hearing is to be held in this Court with the sale being confirmed to the highest and best offer.

Respectfully submitted,

Date: August 31, 2022

/s/ ROBERT H. SLONE  
Robert H. Slone, Esquire  
PA ID No. 19963  
MAHADY & MAHADY  
223 South Maple Avenue  
Greensburg, PA 15601  
(724) 834-2990  
[robertslone223@gmail.com](mailto:robertslone223@gmail.com)

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BEN SHABANDE, STEPHEN CHAPAS, TERRY	)	
NOLL, TONY DAVIS, UNITED STEELWORKERS,	)	
WEST PENN POWER, WESTMORELAND COUNTY)	)	
TAX CLAIM BUREAU, 11585274 CANADA INC.	)	
AND RENEE BASISTA	)	
RESPONDENTS	)	

**CERTIFICATE OF SERVICE FOR TRUSTEE’S MOTION FOR SALE  
OF PERSONAL PROPERTY OF THE ESTATE, HEARING NOTICE AND PROPOSED ORDER**

I, Robert H. Slone, certify under penalty of perjury that on August 31, 2022, I served true and correct copies of the above-referenced documents upon the following persons and parties in interest at the addresses shown by United States First Class Mail, postage prepaid, as follows:

***List “A” was served all the above referenced documents.***

***List “B” was served the Hearing Notice only.***

EXECUTED ON: August 31, 2022

By: /S/ ROBERT H. SLONE  
Robert H. Slone, Esquire  
PA ID No. 19963  
MAHADY & MAHADY  
223 South Maple Avenue  
Greensburg, PA 15601  
(724) 834-2990  
[robertslone223@gmail.com](mailto:robertslone223@gmail.com)

# LIST "A"

Office of the U.S. Trustee  
Liberty Center, Ste. 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222

J. Allen Roth, Esquire  
805 S. Alexandria Street  
Latrobe, PA 15650

Christine Biros  
c/o Bernstein-Burkley, PC  
Sara E. Wenrich  
601 Grant Street, 9<sup>th</sup> Floor  
Pittsburgh, PA 15219

William E. Otto, Esquire  
Law Firm of William E. Otto, Esq.  
PO Box 701  
Murrysville, PA 15668

Christine Biros  
435 Millers Lane  
Pittsburgh, PA 15239

# LIST "B"

11585274 Canada Inc.  
1615-567 Scarborough Golf Club  
Road  
Toronto ON M1G 1H5  
Canada  
John Dull  
120 Kline Avenue  
North Versailles, PA 15137

Fred Banks  
52 S. 8<sup>th</sup>  
Pittsburgh, PA 15203

David Perla  
550 Beatty Drive  
Irwin, PA 15642

Denny Dull  
120 Kline Avenue  
North Versailles, PA 15137

Gary Cheripka  
123 Catskill Avenue  
Pittsburgh, PA 15227

Glenn Mowry  
524 8<sup>th</sup> Street  
Irwin, PA 15642

INW  
800 E Wishkah Street #1003  
Aberdeen, WA 98520

JAR Coal Company  
1985 Lincoln Way  
STE 23-333  
White Oak, PA 15131

James Clawson  
2437 Saunders Station Road  
Monroeville, PA 15146

Jeffrey Shaw  
140 Carriage Drive  
Irwin, PA 15642

Jennifer Verrico  
16 Goldstrom Avenue  
Dravosburg, PA 15034

Mark Myka  
5148 Peach Street #401  
Erie, PA 16509

PA Turnpike Toll by Plate  
PO Box 645631  
Irwin, PA 15642

Peters Painting  
14354 Overholt Drive  
Irwin, PA 15642

R J. Abreu  
39 ½ Wedgwood Drive 1009  
Jewett City, CT 06351

R. Woodall  
Apartado 10199  
San Jose, Costa Rica, 00000

RSS Attn: Bawani  
5307 Victoria Drive #185  
Vancouver BC Canada V5P3V6

Ricoberto Negrete Galeno  
3048 Norland Street  
Carnegie, PA 15106

Sara Stumme  
2705 Bowman Avenue  
McKeesport, PA 15132

Shanni Snyder  
14390 Route 30, Unit H  
Irwin, PA 15462

Sharon McCance  
PO Box 185  
Irwin, PA 15642

Shelly Chabande  
799 Brownstone Road  
Larimer, PA 15647

Ben Chabande  
799 Brownstone Road  
Larimer, PA 15647

Stephen Chapas  
273 Shasta Drive  
Pittsburgh, PA 15239

United Steelworkers  
Attn: James Hill  
386 Toura Drive  
Pittsburgh, PA 15236

Renee E. Basista  
9 Donna Drive  
Irwin, PA 15642

Terry Noll  
1257 Colt  
Irwin, PA 15642

West Penn Power  
76 South Main Street  
Akron, OH 44308

Tony Davis  
6 Liberty Square  
Boston, MA 02109

Westmoreland County Tax  
Claim Bureau  
2 North Main Street, Ste. 109  
Greensburg, PA 15601